1 2 3 4 5 6	QUINN EMANUEL URQUHART & SULLIVA Charles K. Verhoeven (Bar No. 170151) charlesverhoeven@quinnemanuel.com Melissa Baily (Bar No. 237649) melissabaily@quinnemanuel.com Lindsay Cooper (Bar No. 287125) lindsay cooper@quinnemanuel.com 50 California Street, 22nd Floor San Francisco, California 94111-4788 Telephone: (415) 875-6600 Facsimile: (415) 875-6700	AN, LLP	
7	Attorneys for Google LLC		
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10	SAN FRANCISCO DIVISION		
11	SONOS, INC.,	CASE NO. 3:21-cv-07559-WHA Related to CASE NO. 3:20-cv-06754-WHA	
12	Plaintiff,		
13	vs.	DECLARATION OF JOCELYN MA IN SUPPORT OF SONOS, INC.'S ADMINISTRATIVE MOTION TO	
14	GOOGLE LLC,	CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE	
15	Defendant.	SEALED (DKT. NO. 212)	
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CASE No. 3:21-cv-07559-WHA
DECLARATION OF JOCELYN MA

I, Jocelyn Ma, declare and state as follows:

- 1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC ("Google") in this matter. I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.
- 2. I make this declaration in support of Sonos, Inc.'s ("Sonos") Administrative Motion to Consider Whether Another Party's Material Should Be Sealed ("Administrative Motion") (Dkt. 212) filed in connection with Sonos's Third Amended Complaint (Dkt. 211, "TAC"). If called as a witness, I could and would testify competently to the information contained herein.
 - 3. Google seeks an order sealing the materials as listed below:

Document	Portions Sonos Sought to Be Filed Under Seal	Portions Google Seeks to Be Filed Under Seal	Designating Party
Exhibit CD to Sonos's TAC	Entire Document	Entire Document	Google
Exhibit CI to Sonos's TAC	Entire Document	Portions outlined in red boxes	Google
Exhibit CJ to Sonos's TAC	Entire Document	Portions outlined in red boxes	Google
Exhibit CK to Sonos's TAC	Entire Document	Portions outlined in red boxes	Google
Exhibit CL to Sonos's TAC	Entire Document	Portions outlined in red boxes	Google
Exhibit CW to Sonos's TAC	Entire Document	None	Google

4. I understand that the Court applies a "compelling reasons" standard to a sealing request made in connection with a complaint. *See*, *e.g.*, *Novartis Vaccines & Diagnostics*, *Inc. v. Genentech*, *Inc.*, No. 5:21-CV-04874-EJD, 2022 WL 689005, at *2 (N.D. Cal. Feb. 14, 2022); *Bunsow De Mory LLP v. N. Forty Consulting LLC*, No. 20-CV-04997-JSC, 2020 WL 7872199, at *1 (N.D. Cal. Sept. 21, 2020).

5.	Exhibit CD contains information regarding confidential business agreements and
licensing neg	otiations that are not public. I understand that public disclosure of this information
would harm (Google's competitive standing and its ability to negotiate future agreements by giving
competitors a	access to Google's highly confidential business thinking and asymmetrical information
about Google	e's collaboration strategies to other entities. A less restrictive alternative than sealing
Exhibit CD v	would not be sufficient because the information sought to be sealed is Google's
proprietary ar	nd confidential business information but has been utilized by Sonos in support of Sonos's
Third Amend	led Complaint.

6. The portions of Exhibits CI, CJ, CK, and CL outlined in red boxes contain references to Google's confidential business information and trade secrets, including details regarding source code, architecture, and technical operation of Google's products. The specifics of how these functionalities operate is confidential information that Google does not share publicly. Thus, I understand that the public disclosure of such information could lead to competitive harm to Google as competitors could use these details regarding the architecture and functionality of Google's products to gain a competitive advantage in the marketplace with respect to their competing products. Although Sonos's Administrative Motion sought to seal the entirety of these exhibits, Google seeks to seal only the portions outlined in red boxes in the unredacted versions of Exhibits CI, CJ, CK, and CL filed in connection with this Declaration. A less restrictive alternative than sealing the portions outlined in red boxes would not be sufficient because the information sought to be sealed is Google's confidential business information and trade secrets but has been utilized by Sonos in support of Sonos's Third Amended Complaint.

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct. Executed on July 15, 2022, in San Francisco, California.

25 | DATED: July 15, 2022

By: /s/ Jocelyn Ma
Jocelyn Ma